

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: February 18, 2014

REGULAR _____ CONSENT X EFFECTIVE DATE February 18, 2014

DATE: January 30, 2014

TO: Public Utility Commission

FROM: Ryan Bracken *RB*
E *MT CNG* *AA*

THROUGH: Jason Eisdorfer, Maury Galbraith, and Aster Adams

SUBJECT: CASCADE NATURAL GAS: (Docket No. LC 59) Requests a waiver of OAR 860-027-0400(3) for a six-month filing extension for the upcoming Integrated Resource Plan.

STAFF RECOMMENDATION:

Staff recommends Cascade Natural Gas be granted the waiver to OAR 860-027-0400(3) to postpone the filing deadline for their upcoming Integrated Resource Plan (IRP) from August 14, 2014, to February 11, 2015.

DISCUSSION:

On January 7, 2014 Cascade Natural Gas (Cascade, CNG or Company) filed for a waiver of OAR 860-027-0400(3) in order to postpone the filing date of its upcoming IRP from August 14, 2014, to February 11, 2015 pursuant to OAR 860-027-0000(2). The request was made so that Cascade would have the time to improve its load modeling by de-aggregating from the pipeline zonal level to the city-gate level. This one-off change requires a time consuming wholesale reconfiguration of their capacity planning model. Staff agrees with Cascade that this more detailed load analysis will provide the Company and stakeholders better information to assess customers' capacity needs so that better informed decisions about meeting long term demand can be made.

Furthermore, Staff agreed to support the IRP filing extension so long as CNG files an update to its last IRP (Docket No. LC 54) by June 20, 2014.¹ CNG has an option for additional capacity on the Ruby Pipeline (Ruby) at reduced rates that expires in October 2014. This capacity would mainly be used to service Cascade's central Oregon service territory. Analysis evaluating this Ruby Pipeline capacity will be included in this update

¹ CNG will also hold two stakeholder meetings leading up to the IRP update filing.

filing so that Staff and parties can analyze this opportunity on a cost and risk basis in comments and make a recommendation to the Commission before the option expires.² This would not be possible in Cascade's next IRP (Docket No. LC 59) with the August 2014 filing date.

Given that granting the request for the waiver (1) allows CNG to improve its load forecasting methodology, which has been a concern of Staff and others in its recent IRPs, and (2) allows Staff and Parties an opportunity to analyze Cascade's option for reduced rate capacity on Ruby before the option expires, Staff supports CNG's request for a filing extension for its upcoming IRP.

No parties are opposed to the waiver request. The following table shows the schedule for Docket Nos. LC 54 and LC 59 with filing deadlines and tentative stakeholder meeting dates.

Date	2011 IRP Update (Docket No. LC 54)
Mar 24, 2014	1st workshop on capacity issues (Ruby, GTN, NWP, etc)
Apr 28, 2014	2nd workshop on capacity issues (Ruby, GTN, NWP, etc)
June 20, 2014	2011 IRP Update Filing with Ruby and capacity discussion
July 18, 2014	Staff and Stakeholder comments due on 2011 IRP Update
Aug 1, 2014	CNGC response to comments regarding 2011 IRP update due
Aug 8, 2014	Staff and stakeholder final comments on 2011 IRP update (if necessary)
Aug 15, 2014	CNGC response to final comments regarding 2011 IRP update due (if necessary)
Aug 26, 2014	Staff Report issued on 2011 IRP Update
Sep 2, 2014	Public meeting on 2011 IRP Update

Date	2015 IRP (Docket No. LC 59)
June 04, 2014	TAG 1: Process, Key Assumptions (IRP Team, Timeline, Highlights of 2011 IRP, Latest Economic Indicators, Price Forecast and Demand Forecast)
July 02, 2014	TAG 2: Conservation, Avoided Costs, Distribution Enhancements
Aug 6, 2014	TAG 3: Supply Resources, Transport Issues, Alternative Resources, Update on 2 Year Plan
Sep 10, 2014	TAG 4: Preliminary Resource Integration Results, Proposed new 2 year Plan
Oct 8, 2014	Draft IRP distributed
Nov 5, 2014	Comments due on draft
Dec 10, 2014	TAG 5: If Needed
Jan 9, 2015	Final IRP goes to press
Feb 11, 2015	2015 IRP filing

² If CNG's analysis shows the need for additional Ruby capacity, they will seek acknowledgement for the capacity in the update filing.

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PROPOSED COMMISSION MOTION:

The request by Cascade Natural Gas of a waiver to OAR 860-027-0400(3) be granted and the filing deadline for their upcoming IRP be moved from August 14, 2014, to February 11, 2015.

LC 59- CNG IRP filing deadline extension